

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

THE DAILY WIRE, LLC *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF STATE *et al.*,

Defendants.

Civil Action No. 6:23-cv-00609 (JDK)

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JAMES J. GILLIGAN
Special Litigation Counsel,
Federal Programs Branch

JOSHUA E. GARDNER
Special Counsel,
Federal Programs Branch

DOROTHY M. CANEVARI
CRISTEN C. HANDLEY
CODY T. KNAPP
ARJUN MODY
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch

Pursuant to Local Civil Rule 7(k), the government respectfully requests leave to file a 12-page reply brief in support of Defendants' Motion to Dismiss, two pages in excess of the page limit that applies to reply briefs for dispositive motions. Good cause supports this request:

1. The government filed its Motion to Dismiss on March 25, 2024. ECF No. 33. Plaintiffs filed their Opposition on April 10, 2024. ECF No. 41. The government's Reply is due on April 17, 2024.
2. Plaintiffs attached 52 exhibits to their opposition brief, totaling over 500 pages.
3. In order to adequately address the issues raised in Plaintiffs' Opposition and the attached exhibits, the government respectfully requests leave to file a 12-page reply brief, which is 2 pages more than the 10 pages allowed under Local Rule 7(a)(1).
4. Undersigned counsel has conferred with counsel for Plaintiffs, who do not oppose this request. Both parties have consented to all prior requests for extra pages in this litigation.

Dated: April 17, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JAMES J. GILLIGAN
Special Litigation Counsel
Federal Programs Branch

JOSHUA E. GARDNER
Special Counsel
Federal Programs Branch

/s/ Arjun Mody
DOROTHY M. CANEVARI (NY # 5989694)
CRISTEN C. HANDLEY (MO # 69114)
CODY T. KNAPP (NY # 5715438)
ARJUN MODY (DC #90013383)
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch

1100 L Street, N.W.
Washington, D.C. 20005
Tel: (202) 451-772
Email: arjun.a.mody@usdoj.gov

Counsel for Defendants

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(i), counsel for Defendants conferred with counsel for Plaintiffs regarding the relief requested in this motion. Plaintiffs do not oppose the motion.

/s/ Arjun Mody
ARJUN MODY

CERTIFICATE OF SERVICE

On April 17, 2024, I electronically submitted this document to the clerk of court of the U.S. District Court for the Eastern District of Texas using the court's electronic case filing system. I certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Arjun Mody
ARJUN MODY